## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF INDIANA NEW ALBANY DIVISION

In re:	) Chapter 11
	)
EASTERN LIVESTOCK CO., LLC,	) Case No. 10-93904-BHL-11
	)
Debtor.	)

# AGREED MOTION FOR AUTHORITY TO APPROVE STIPULATION RESOLVING CLAIMS OF RUSSELL DECORDOVA D/B/A DECORDOVA CATTLE COMPANY

James A. Knauer, as Chapter 11 Trustee (the "<u>Trustee</u>") for Eastern Livestock

Co., LLC ("<u>ELC</u>") and Russell deCordova d/b/a deCordova Cattle Company ("<u>deCordova</u>" and together with the Trustee, the "<u>Parties</u>") submit this motion (the "<u>Motion</u>") seeking entry of an order approving the Stipulation Resolving Claims of Russell deCordova d/b/a deCordova Cattle Company (the "<u>Stipulation</u>") attached hereto as <u>Exhibit A</u> and state as follows:

The Parties wish to stipulate and agree to the final allowance of claims asserted by deCordova in this chapter 11 case without the need for claims objections or further litigation.

The Parties have negotiated the Stipulation at arm's length and in good faith and believe that the Stipulation is in the best interests of the Parties and ELC's chapter 11 estate.

WHEREFORE, the Parties respectfully request that the Court enter an Order approving the Stipulation and for all other just and appropriate relief.

#### Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that on October 3, 2013, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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